

EXHIBIT C

David Crowe

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION

4 _____

5 IN RE: |

6 FLINT WATER CASES |

7 | No: 5:16-cv-10444-JEL-EAS

8 | HON. JUDITH E. LEVY

9 | MAG. ELIZABETH A. STAFFORD

10 _____|

11 Pages 1 - 204.

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13 The videotaped deposition of DAVID CROWE, Ph.D.

14 taken via Golkow Virtual Remote,

15 commencing at 10:04 a.m.

16 Tuesday, April 18, 2023

17 before Ann L. Bacon CSR-1297.

18

19 VIDEOGRAPHER: MR. BILL GEIGERT

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1 corrosion control resulted in elevated lead
2 release, correct, sir?

3 MR. TER MOLEN: Objection, asked and
4 answered.

5 A. The evidence is that lead was released during
6 the event. I have seen that evidence.

7 Q. (Continuing, by Ms. Levens) You have seen that
8 evidence?

9 A. Yes, I think that's pretty well-accepted.

10 MS. LEVENS: I think this might be a
11 good time to take a break for lunch.

12 A. Okay.

13 VIDEOGRAPHER: Off the record 12:53.

14 (Recess 12:53 p.m. to 1:30 p.m.)

15 VIDEOGRAPHER: We are back on the
16 record at 1:30 p.m.

17 Q. (Continuing, by Ms. Levens) Welcome back,
18 Dr. Crowe. Having taken a break for lunch, is
19 there any testimony from earlier today that you
20 would like to change?

21 A. No.

22 Q. Both today and throughout your reports, you've
23 referenced weepers. Can you tell me what
24 weepers are in your opinion?

25 A. A weeper is an area on a pipe where there is

1 kind of a pit or some other defect on the other
2 side which is filled with scale and other
3 deposits and so it forms kind of a porous plug
4 and so water can get, can diffuse through that
5 scale or whatever else is in that plug and wet
6 the exterior surface and sometimes you'll see a
7 hail of salts and other things that have
8 collected in that area. It would just be
9 slightly damp, so that's a weeper.

10 Q. And is a weeper more or less serious than a pit?

11 MR. TER MOLEN: Objection to form, vague.
12 You can answer if you understand.

13 A. I don't think there's a way to rank whether one
14 is better than the other, honestly.

15 Q. (Continuing, by Ms. Levens) In your opinion is
16 the existence of weepers a sign of pipe failure?

17 A. I think that from most people's point of view,
18 particularly the owners of the home, weepers
19 aren't really a failure from their perspective
20 because water is not really leaking out, it's
21 not dripping. From the materials point of view
22 or from somebody concerned with materials, it's
23 time to replace the pipe, so it's not a failure
24 but an indication of end of life.

25 Q. And would you consider you're someone who is

1 thinking about these things from a materials
2 point of view?

3 A. I try to think about it from every point of view.

4 Q. Do you regard yourself as a materials expert?

5 A. Yes, I think so.

6 Q. And do you regard pits as a sign of pipe failure?

7 A. No, they're not a sign of pipe failure.

8 Q. Do you regard them as a sign of a pipe in good
9 condition?

10 A. Depending on the extent of the piping, it could
11 be in good condition or it could be nearing the
12 end of its life.

13 Q. What would demonstrate a pipe in good condition
14 that still shows pits?

15 A. A pipe that has very, very few pits or shallow
16 pits would not be considered a failure.

17 Q. And how would you define a shallow pit?

18 A. When you look at pits and you cross-section
19 them, they have different aspect ratios. That
20 means that the base of them, it could be wide
21 and then the depth not very deep, so there would
22 be kind of a wide aspect. You could have others
23 that are like a drill, that they are very long
24 and they're small diameter and those are a sharp
25 pit, so there's shallow pits and then there's

1 STATE OF MICHIGAN)


)

2 COUNTY OF MACOMB)

3 I, Ann L. Bacon, a Notary Public in and for
4 the above county and state, do hereby certify
5 that the witness, whose attached deposition was
6 taken before me in the entitled cause on the
7 date, time and place hereinbefore set forth, was
8 first duly sworn to testify to the truth, and
9 nothing but the truth; that the testimony
10 contained in said deposition was reduced to
11 writing in the presence of said witness by means
12 of stenography; that said testimony was
13 thereafter reduced to written form by mechanical
14 means; and that the deposition is, to the best
15 of my knowledge and belief, a true and correct
16 transcript of my stenographic notes so taken.

17 I further certify that the signature to and
18 the reading of the deposition by the witness was
19 waived by counsel for the respective parties
20 hereto; also, that I am not of counsel to either
21 party or interested in the event of this case.

22

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Ann L. Bacon, Notary Public, Macomb County

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Acting in Macomb County

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My commission expires: 6/29/23